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ASSISTANT MANAGER
FOR NUCLEAR PROGRAMS



Reply to
Attention of: HW-112

J. E. Solecki, Acting Assistant Manager
Nuclear Programs
Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

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SUBJECT: Notice of Deficiency for Closure Plan Submittal

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Dear Mr. Solecki;

The United States Environmental Protection Agency Region 10 (EPA), and the Idaho Department of Health and Welfare (IDHW) have reviewed DOE-ID's revised closure plan schedule, submitted in a letter of September 29, 1989. Both EPA and IDHW feel the schedule is deficient.

During the September 21, 1989 meeting in Boise, Idaho, EPA and IDHW agreed to allow DOE-ID to submit a proposed schedule for closure plan submittal dates by September 29, 1989. This schedule was to be for Land Disposal Units (LDU) undergoing field work/characterization starting in the 1989 calendar year.

Concern was expressed by both EPA and IDHW that the presentations from INEL contractors did not contain distinct dates for closure plan submittals. It was also expressed that EPA and IDHW expect to see plans submitted starting in the Spring of 1990. These submittals would be for the six (6) EG&G and five (5) WINCO LDUs which are clean - closure candidates undergoing field work during the 1989 calendar year.

These LDUs include:

| | <u>UNIT ID. NO.</u> | <u>UNIT NAME</u> |
|-----------------|---------------------|---|
| EG&G Units; | CFA-05 | Motor Pool Pond |
| | TRA-06 | Chemical Waste Pond |
| | TRA-02 | Paint Shop Ditch |
| | ARA-01 | Chemical Evaporation Pond |
| | PBF-10 | Reactor Area Evaporation Pond |
| | PBF-08 | Reactor Area Corrosive Waste Disposal Sump Brine Tank |
| WINCO Units; | CPP-39 | HF Storage Tank and Dry Well |
| | CPP-59 | Kerosine Spill |
| | CPP-64 | Hexone Spill |

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LDUs (continued)

UNIT ID. NO.

UNIT NAME

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CPP-23
CPP-34*

Injection Well
Contaminated Soil Trench

*This LDU is understood not to be a clean - closure candidate.

The revised/proposed closure plan schedule submitted to EPA on September 29, 1989 is not acceptable except for units: CPP-23 due March 3, 1990; CPP-34 due June 18, 1990; and CPP-64 due July 19, 1990. Five (5) remaining closure plans shall be submitted to EPA and IDHW May 15, 1990, and three (3) on June 26, 1990.

DOE-ID shall respond to EPA with a copy to IDHW within 21 days of the date of this letter with a schedule providing the identity of each LDU closure plan to be submitted on each given date.

If there are unexpected delays which will require the change of a particular submittal date, DOE-ID shall notify EPA and IDHW promptly for possible approval of this action.

Monthly status reports are due to EPA with a copy to IDHW no later than 7 days after the first day of each month.

The characterizations undertaken for each LDU must be sufficient to properly assess all contaminants and possible contaminant migration, and for a proper assessment of the closure process which must be undertaken.

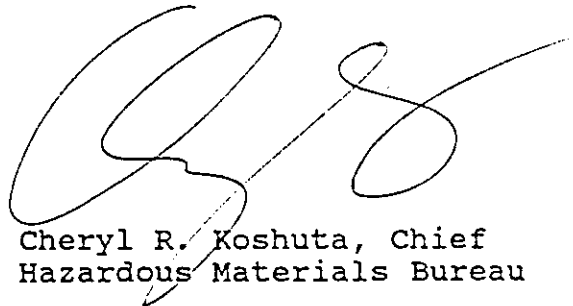
As discussed in the September 21, 1989 meeting, a schedule defining the submittal dates for the remaining LDU closure plans shall be submitted after the current field season. This schedule shall be submitted to EPA and a copy to IDHW by January 12, 1990.

If you have any questions regarding this Notice, please contact Jeffry Rodin of EPA at FTS-399-2859, or Brian Monson of IDHW at (208) 334-5879.

Sincerely,



Michael F. Gearheard, Chief
Waste Management Branch



Cheryl R. Koshuta, Chief
Hazardous Materials Bureau